



## DISABILITY AND COMMUNICATION ACCESS BOARD

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### INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

**Docket:** **DCAB 2004-12:** Does door hardware with the characteristic functions equivalent to ANSI F07, F30, F86, F87 comply with the ADAAG, Section 4.13.9 Hardware?

**Summary:** The current ADAAG Section 4.13.9 does not address the characteristic functions of accessible door hardware. The functions noted in this docket are often used on doors to areas that need access such as utility rooms, electrical rooms and storage rooms, etc., but need to be always locked due to a safety issue. ADAAG 4.13.9 states that handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. These types of door hardware functions require two hands every time to operate the latchbolt mechanism to open the door on the pull side. One hand is used to disengage the latchbolt mechanism with a key and the other hand is used to grasp the door handle, such as a U-shaped handle, a lever-operated mechanism, or a push type mechanism. In addition, the key, which is considered part of the operating mechanism, per DCAB's IO 93-50.522, requires tight pinching and twisting of the wrist to temporarily hold the door in an unlocked position. Both the DOJ and the U.S. Access Board stated these types of characteristic functions would not comply if any portion of the requirement in the ADAAG, Section 4.13.9 were not met. If these hardware functions are used to address safety issues or other code requirements, the U.S. Access Board indicated there were other types of mechanisms and hardware available that comply with ADAAG 4.13.9.

**Ruling:** For buildings or facilities subject to HRS § 103-50,

#### **ADAAG 4.13.9 Door Hardware**

Door Hardware with a hardware function that takes two hands to operate, one to hold, pinch and twist a key to disengage the latch bolt, and one hand to open the door at the same time, does not comply with ADAAG, section 4.13.9.

[Rul: 07/04] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call 586-8121.

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